



6500 West Cortland Street • Chicago, Illinois 60707 • 773-889-8870 • Fax: 773-794-1930

July 29, 2011

Filed Electronically

Ms. Marlene H. Dortch
Secretary
Federal Communication Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Re: Comments on LightSquared Technical Working Group Report
FCC File No. SAT-MOD-20101118-00239
IB Docket No. 11-109

Dear Ms. Dortch,

Cobra Electronics Corporation ("Cobra") respectfully submits comment in response to the IB Docket number 11-109 on the matter of LightSquared Technical Working Group Report.

Background:

Cobra has been in the business of designing and selling GPS related products since 2002 starting with handheld GPS to our present product line of Trucker Navigation products sold to the professional truck driver.

Cobra sells our Trucker Navigation products as a dock to dock navigation device specifically designed for truck navigation. This product takes into account road restrictions based on 12 different truck types and 20 different attributes that the professional driver enters into his unit. These restrictions include safety issues like bridge heights, truck weight, truck width, no trucks roads, and truck length restrictions to safely guide the trucker from his present position to his destination. These products also include a database which has many other soft restrictions which are not dangerous but help the trucker avoid driving down a road which he may not be authorized to use.

Comments:

Intermittent or inaccurate GPS caused by interference could cause serious problems to these professional drivers who depend on our product to safely navigate them from dock to dock. Trucks inadvertently driving through a restriction like a low bridge height could yield dangerous consequences. Even the soft restrictions can cause a problem if the driver were to violate local road restrictions.

Although Cobra has not done any testing near LightSquared transmitters, we do know, at signal levels described in the report, that our products do not have adequate out band rejection and will have problems correctly determining the location of the truck near the transmitter. In some cases this will cause what is called map matching problems, causing the unit to think it is on another road which may cause the unit to give the trucker poor route guidance, possibly putting them in harm's way.

Although Lightsquared claims that the GPS industry knew of its plans to place land based transmitters in bands adjacent to GPS, this is certainly not true of the smaller companies like ours. We have been in the industry since 2002 but have not heard of this issue until recently. Because of this, none of our product is designed to reject this interference and I don't think our product could provide reliable trucker navigation near the transmitter locations. Please note, at the signal level described in the report, I am unaware of a filter which could provide the proper rejection in all cases. This doesn't even include the problems we could have with handheld devices which could be in very close proximity of the navigation unit.

In conclusion, Cobra Electronics Corporation asks that the FCC not authorize LightSquared to construct the proposed network of terrestrial transmitters till it has proven that it doesn't interfere with the present GPS products available in the marketplace.

Best Regards,

A handwritten signature in black ink, reading "William Chamberlain". The signature is fluid and cursive, with the first name "William" and last name "Chamberlain" clearly distinguishable.

William Chamberlain
Vice President, Engineering and Quality
Cobra Electronics Corporation